



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CELIA JANE LETENDER QUINN,  
aka "Jane Quinn,"  
aka "Jane Letender,"

Defendant.

CR No. 2:23-cr-00566-FMO

I N D I C T M E N T

[18 U.S.C. § 641: Theft of  
Government Property in Excess of  
\$1,000; 18 U.S.C. § 981(a)(1)(C)  
and 28 U.S.C. § 2461(c): Criminal  
Forfeiture]

The Grand Jury charges:

COUNTS ONE THROUGH FIFTEEN

[18 U.S.C. § 641]

On or about the dates set forth below, in Los Angeles County,  
within the Central District of California, defendant CELIA JANE  
LETENDER QUINN, also known as ("aka") "Jane Quinn," aka "Jane  
Letender," knowingly and willfully stole, purloined, and converted to  
her own use property of the United States Social Security  
Administration (the "SSA"), a department and agency of the United  
States, having a value in the aggregate in excess of \$1,000, namely,  
Retirement Insurance Benefits in the following amounts, to which she

knew that she was not entitled, with the intent to deprive the SSA of the use and benefit of that money:

COUNT	DATE	AMOUNT
ONE	12/03/2018	\$1,731
TWO	01/03/2019	\$1,782
THREE	02/01/2019	\$1,782
FOUR	03/01/2019	\$1,782
FIVE	04/03/2019	\$1,782
SIX	05/03/2019	\$1,782
SEVEN	06/03/2019	\$1,782
EIGHT	07/03/2019	\$1,782
NINE	08/02/2019	\$1,782
TEN	09/03/2019	\$1,782
ELEVEN	10/03/2019	\$1,782
TWELVE	11/01/2019	\$1,782
THIRTEEN	12/03/2019	\$1,782
FOURTEEN	01/03/2020	\$1,803
FIFTEEN	02/03/2020	\$1,803

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in any of Counts One through Fifteen of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to any such offense; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has

1 been substantially diminished in value; or (e) has been commingled  
2 with other property that cannot be divided without difficulty.

3 A TRUE BILL

4  
5 /s/  
6 Foreperson

7 E. MARTIN ESTRADA  
8 United States Attorney

9 MACK E. JENKINS  
10 Assistant United States Attorney  
11 Chief, Criminal Division



12 SCOTT M. GARRINGER  
13 Assistant United States Attorney  
14 Deputy Chief, Criminal Division

15 IAN V. YANNIELLO  
16 Assistant United States Attorney  
17 Deputy Chief, General Crimes  
18 Section

19 HAOXIAOHAN CAI  
20 Assistant United States Attorney  
21 General Crimes Section  
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